

EXHIBIT

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF RAFAELA MARTINEZ

I, Rafaela Martinez, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at One Bowling Green, NY when the terrorist attacks of the World Trade Center Towers occurred.

4. I was an employee for OneSource assigned to the Ellis Island account. On the morning of September 11, 2001, I was sent to assist the OneSource Chief Engineer, Joe Grochowski, with paperwork at the federal building at Bowling Green. Attached as Exhibit B is my proof of presence at Ground Zero.

5. I was doing paperwork for Mr. Grochowski when the attacks began. When the second plane hit the World Trade Center, I became very frightened and I left work to get out of the city. As I was running to escape, I witnessed atrocities beyond the imagination of the average citizen. Attached as Exhibit C to this Declaration is my personal statement detailing my experience on that horrific day. I saw individuals jumping from the towers like birds and the building splitting in half in a ball of fire. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever. In my attempt to leave the area, I became trapped in the fumes and debris of the collapsing World Trade Center. I was unable to breathe and went unconscious. When I awoke, I was told I had been evacuated to Bayonne Hospital and remained there for my injuries from September 11 – 13. Attached as Exhibit D are the medical records from my hospital stay and the ongoing treatment I have required since.

6. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: sprained right hand, leg contusions, post-concussion syndrome, hypertension, chronic obstructive pulmonary disease, and PTSD, with depression, anxiety and cognitive deficits.

7. The images of the building going up in flames and individuals jumping from the towers continues to haunt me and will for the rest of my life. As a result, I suffer from PTSD, depression and anxiety. I am being treated with psychotherapy, attention and cognition enhancement therapy, and receive the following medications: Lexapro, Ambien and Lorazepam. The trauma has been so severe that I have attempted to commit suicide on four separate occasions and suffer from sleep apnea. My medical records for the neuropsychiatric services required can be located in Exhibit D.

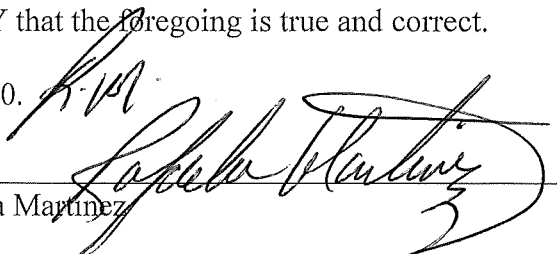
8. My injuries required medical attention and hospitalization on September 11, 2001. To this day, I receive ongoing treatment. I regularly see a Cardiologist for my hypertension and coronary artery disease, which required the implantation of a loop recorder in my heart in 2015. The extensive smoke inhalation has caused severe respiratory complications, including asthma and chronic obstructive pulmonary disease, which requires regular use of a Nebulizer. Exhibit D to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

9. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.

10. I previously pursued a claim (Claim Number VCF 212-002747) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 31 day of January 2020.



Rafaela Martinez

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**